

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

TERRI PEPPER, DALLAS DEAN, DAVE )  
SEMANS, CARL MORELAND, HAROLD )  
AYDELOTT, DAVID CATHEY, JUSTIN )  
EVANS, KATHY DUFF, MELANIE )  
EDWARDS, MICHAEL DELONG, )  
NICOLE VELA GROSKOPF, RICHARD )  
HENDERSON, TODD CIANCIULLI, )  
JULIE LEICHTLE and CLINT STEINER, )  
individually and on behalf of all others )  
similarly situated, )

Case No. 4:20-cv-2961

Plaintiff, )

v. )

BEST STORM LEADS CORP., )

Defendant.

---

**CONSENT NOTICE OF SETTLEMENT**

Plaintiffs Terri Pepper, Dallas Dean, Dave Semans, Carl Moreland, Harold Aydelott, David Cathey, Justin Evans, Kathy Duff, Melanie Edwards, Michael DeLong, Nicole Vela Groskopf, Richard Henderson, Todd Cianciulli, Julie Leichtle, and Clint Steiner respectfully hereby gives notice to the Court that the parties in the above-styled matter have reached a settlement in principal of this case in its entirety. The parties are currently preparing a written settlement agreement, but anticipate it will take up to ninety (90) days to finalize all of the settlement documents and carry out all of the actions contemplated therein. Plaintiffs respectfully request that the parties be given ninety (90) days to finalize the settlement agreement and file the notice of dismissal. Undersigned counsel has consulted with Defendant's representative, who consents to the relief requested herein.

This the 13th day of January, 2021.

/s/ Cory S. Fein

CORY S. FEIN (TX Bar No. 06879450)

CORY FEIN LAW FIRM

712 Main Street, Suite 800

Houston, TX 77002

(281) 254-7717

(530) 748 - 0601 (fax)

[cory@coryfeinlaw.com](mailto:cory@coryfeinlaw.com)

/s/ Derek M. Bast

Sean C. Wagner (*pro hac vice*)

Derek M. Bast (*pro hac vice*)

WAGNER HICKS PLLC

831 E. Morehead Street, Suite 860

Charlotte, North Carolina 28202

Telephone: (704) 705 7358

[sean.wagner@wagnerhicks.law](mailto:sean.wagner@wagnerhicks.law)

[derek.bast@wagnerhicks.law](mailto:derek.bast@wagnerhicks.law)

ATTORNEYS FOR PLAINTIFFS  
AND THE PROPOSED CLASS

**CERTIFICATE OF CONFERENCE**

I certify that Defendant's counsel stated on January 13, 2021 that the Defendant consents to the relief sought by this motion.

/s/ Derek M. Bast

Derek M. Bast

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I further certify that I have this day served a copy of the foregoing on the following non-CM/ECF participants by depositing a copy thereof in an envelope bearing sufficient postage in the United States mail, addressed to the following person(s) at the following address(es), which is/are the last address(es) known to me:

Best Storm Leads Corp.  
c/o Ali DeLavari, Registered Agent  
2952 Rodeo Drive  
Minneapolis, MN 55449

This the 13th day of January, 2021.

/s/ Derek M. Bast

Derek M. Bast